

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

JUVENTINO AYALA and TAMY CHAPA

Plaintiffs,

vs.

**4600 OCEAN DRIVE CONDOMINIUM
ASSOCIATION
Defendant.**

§
§
§
§
§
§
§
§

CIVIL ACTION No. 2:21-cv-253

JOINT STIPULATION OF DISMISSAL OF JUVENTINO AYALA WITH PREJUDICE

Plaintiff Juventino Ayala ("Plaintiff") and Defendant 4600 Ocean Drive Condominium Association ("Defendant"), by and through their undersigned counsel, hereby submit the following for their Joint Stipulation of Dismissal with Prejudice:

1. Plaintiff and Tamy Chapa brought this action against Defendant alleging violations of the overtime provisions of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201, *et seq.*

2. After arm's length negotiations in which Plaintiff and Defendant were represented by counsel, Plaintiff and Defendant reached an agreement that resolves all claims in this lawsuit; Plaintiff and Defendant believe their agreement is a fair, reasonable and adequate compromise of a bona fide dispute.

3. The parties file this stipulation of dismissal with prejudice pursuant to Rule 41(a)(1)(A)(ii), which allows a case to be dismissed by stipulation if signed by all parties who have appeared.

4. The parties hereby stipulate to the dismissal of Plaintiff's claims in this lawsuit with prejudice, with each side to bear its own fees and costs except as otherwise agreed.

5. This stipulation of dismissal is not intended to affect the claims of any other Plaintiff in this case.

Dated: May 28, 2024

Respectfully submitted,

/s/ Josh Sanford

Josh Sanford
Tex. Bar No. 24077858
josh@sanfordlawfirm.com
Sean Short
Ark. Bar No. 2015079
sean@sanfordlawfirm.com
SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Pkwy,
Suite 510
Little Rock, Arkansas 72211

**ATTORNEYS FOR PLAINTIFF
JUVENTINO AYALA**



Tonya Beana Webber
Southern District ID No. 6145
Texas Bar No. 21042300
twebber@prdq.com
PORTER, ROGERS, DAHLMAN &
GORDON, P.C.
One Shoreline Plaza
500 N. Shoreline Blvd., Suite 300
Corpus Christi, Texas 78401
Telephone: (361) 880-5808
Facsimile: (361) 880-5844

**ATTORNEYS IN CHARGE FOR
DEFENDANT
4600 OCEAN DRIVE CONDOMINIUM
ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of May 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing upon the counsel below:

Tonya Beana Webber

twebber@prdq.com

PORTER, ROGERS, DAHLMAN & GORDON, P.C.

Plains Capital Bank

500 N. Shoreline Blvd., Suite 300

Corpus Christi, Texas 78401

John W. Tinder

Jnylaw2010@gmail.com

The Tinder Law Firm, LLP

226 S. Tancagua St.

Corpus Christi, TX 78401

/s/ Josh Sanford

Josh Sanford